

EXHIBIT 57

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

STATE OF NEW YORK, et al.

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official capacity as
SECRETARY OF THE U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES, et al.,

Defendants.

Case No. 1:25-cv-00196

**DECLARATION OF RAJNI CHAWLA, EXECUTIVE DEPUTY COMMISSIONER OF
THE NEW YORK STATE OFFICE OF TEMPORARY AND DISABILITY ASSISTANCE**

I, RAJNI CHAWLA, declare as follows:

1. I am the Executive Deputy Commissioner of the New York State Office of Temporary and Disability Assistance (OTDA). I am familiar with the information in the statements set forth below either through personal knowledge, in consultation with OTDA staff, or from documents that have been provided to and reviewed by me.

2. I submit this Declaration in support of the States' Motion for a Preliminary Injunction.

3. As OTDA's Executive Deputy Commissioner, I am the principal assistant to the Commissioner of OTDA. I advise on matters of policy and co-manage the operations of the agency with the Commissioner.

4. The mission of OTDA is to help vulnerable New Yorkers meet their essential needs and advance economically by providing opportunities for stable employment, housing, and nutrition. The agency's vision is to empower New Yorkers to improve their financial security and household stability in support of strong families and communities.

5. OTDA administers a wide range of programs that provide services and support to low-income families and individuals. OTDA oversees programs administered through social services districts (districts), including Supplemental Nutrition Assistance Program (SNAP), Home Energy Assistance Program (HEAP), and Public Assistance (PA), and provides policy guidance and systems support to the districts in implementation of OTDA programs, as well as monitoring and quality assurance of district operations and adjudication of fair hearings reviewing district determinations.

The Federal Poverty Guidelines

6. The Federal Poverty Guidelines are used by federal, state, local, and tribal agencies in numerous ways, including to assess eligibility for certain means tested programs.

7. The U.S. Department of Health and Human Services (HHS) maintains the Federal Poverty Guidelines and updates them annually.

8. New York State relies on the Federal Poverty Guidelines to determine eligibility for means-tested benefit programs, including, but not limited to SNAP, HEAP, and PA, which collectively reach millions of New Yorkers.

9. Additionally, the State also utilizes the Federal Poverty Guidelines to calculate thresholds for child support orders where orders may otherwise cause financial distress for the court-ordered payor parent.

Harm from Delay or Failure to Maintain the Federal Poverty Guidelines

10. Delay or inaccuracy in the computation of the Federal Poverty Guidelines could result in significant harm to New York State.

A. **SNAP, HEAP, and PA**

11. Delayed or inaccurate Federal Poverty Guidelines will likely create disruptions and uncertainty for individuals and families applying for and in receipt of SNAP, HEAP, PA, as

well as other OTDA-overseen programs that utilize PA eligibility standards, such as Emergency Assistance to Families (EAF), Emergency Safety Net Assistance (ESNA), Temporary Housing Assistance, and Family Homeless and Eviction Prevention Supplements (FHEPS), because these programs are means tested and rely on Federal Poverty Guidelines to determine eligibility and to calculate entitlement amounts.

12. Delayed or inaccurate Federal Poverty Guidelines will likely result in some miscalculated issuances or erroneous eligibility determinations. In the instance of miscalculation, a recipient could either receive less than they were entitled to receive, or more, causing the State to expend resources to recoup the over-issuance.

13. The State will also need to expend resources to address disruption and uncertainty. OTDA is tasked with issuing guidance to social services officials regarding the applicable Federal Poverty Guidelines to be used for determining eligibility for these programs. Delayed or inaccurate Federal Poverty Guidelines will lead to the expense of State resources to field questions from districts, advocates, and applicants/recipients generated by the disruption.

14. Erroneous eligibility determinations for means tested benefits by districts could result in increased fair hearings requests, placing a burden on New York State to conduct hearings, reach decisions, and notify households and social services officials of decisions within mandated timeframes.

15. A delay will also necessitate additional system work. Yearly system changes based upon the annually revised Federal Poverty Guidelines require significant production time and are built into New York State's production schedule one year in advance. If the Federal Poverty Guidelines are delayed, the system update will need to be rescheduled, which will generate additional programming and testing to accommodate the rescheduling.


B. Child Support Standards

16. The failure to issue timely and accurate Federal Poverty Guidelines will result in the inability of the State to update statewide guidelines as required by federal law. The statewide guidelines are used for the calculation of child support obligations by parents, attorneys, and the New York State courts, and failure to update the Federal Poverty Guidelines would cause uncertainty in the validity of the calculations and resulting child support orders.

17. Without revising the 2025 Federal Poverty Guidelines standard next year, millions of low-income New Yorkers could be at risk of incorrect eligibility and benefit amount determinations that are critical to obtaining and maintaining financial security.

18. I declare under penalty of perjury under the laws of the States of New York and Rhode Island and the United States of America that, to the best of my knowledge, the foregoing is true and correct.

DATED this 8th day of May, 2025, at Albany, New York.



Rajni Chawla
OTDA Executive Deputy Commissioner